

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Karen Funderburk, on behalf of herself and all others similarly situated,

Plaintiff,

v.

The Wirbicki Law Group, LLC,

Defendant.

Case No.: 1:13-cv-04848

Judge: Elaine E. Bucklo

Magistrate Judge: Young B. Kim

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendant, The Wirbicki Law Group, LLC, (“Defendant”), by its attorneys, David M. Schultz, Matthew R. Henderson, and Katherine H. Tresley, moves pursuant to Rule 6 for an enlargement of time of seven (7) days to respond to the Attorney Fee Submission of Plaintiff, Karen Funderburk (Plaintiff), and in support thereof, states as follows:

1. On August 26, 2014, this Court entered an Order requiring Plaintiff to file her time sheets and fee demand to Defendant by September 5, 2014 and Defendants to respond by September 15, 2014.

2. On September 5, 2014, Plaintiff served a Certification of Lance A Raphael which is 15 single-spaced pages with over 100 pages of exhibits.

3. This Court ordered Defendant's Response to Plaintiff's Fee Petition due by September 15, 2014. (Docket # 69).

4. Attorney Matt Henderson is attending the ABA Conference on Attorney Malpractice in San Francisco from September 10 to 14, 2014. Mr. Henderson's associate, Katherine Tresley has the stomach flu and has been out of the office part of the week of September 8, 2014.

5. Given the size and scope of Plaintiff's fee petition and the scheduling issues for defense counsel, Defendant requests seven (7) additional days to serve its response.

6. This additional time is not meant for purposes of delay or harassment.

7. Defense counsel conferred with opposing counsel. There is no objection to the relief requested herein.

WHEREFORE, Defendant The Wirbicki Law Group, LLC respectfully requests this Court grant its Motion for an enlargement of time of seven (7) days to respond to the Attorney Fee Submission of Plaintiff, Karen Funderburk, up through and including September 22, 2014, and further to reset the telephone status hearing on September 19, 2014, and for such further relief as the Court deems to be just and equitable.

Respectfully submitted,

By: /s/ Katherine H. Tresley  
One of the Attorneys for  
Defendant

David M. Schultz  
Matthew R. Henderson  
Katherine H. Tresley  
HINSHAW & CULBERTSON LLP  
222 N. LaSalle Street, Suite 300  
Chicago, IL 60601-1081  
312-704-3000  
(f) 312-704-3001  
[dschultz@hinshawlaw.com](mailto:dschultz@hinshawlaw.com)  
[mhenderson@hinshawlaw.com](mailto:mhenderson@hinshawlaw.com)  
[ktresley@hinshawlaw.com](mailto:ktresley@hinshawlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on **September 10, 2014**, I electronically filed the forgoing **Unopposed Motion for Enlargement of Time** with the Clerk of the U.S. District Court, using the CM/ECF system reflecting service to be served upon all parties of record.

HINSHAW & CULBERTSON LLP

*/S/ Katherine H. Tresley*  
\_\_\_\_\_  
Katherine H. Tresley  
Attorney For Defendant  
222 North LaSalle Street, Suite 300  
Chicago, Illinois 60601  
312/704-3000  
312/704-3001 – Facsimile  
[Ktresley@Hinshawlaw.Com](mailto:Ktresley@Hinshawlaw.Com)